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F. #2022R00099

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA COMPLAINT

- against - (18 U.S.C. § 1951(a))

WILLIE VITAL, Case No. 22-MJ-303

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

THOMAS NUZIO, being duly sworn, deposes and states that he is a Task Force Officer with the Bureau of Alcohol, Tobacco and Firearms, and Explosives (“ATF”), duly appointed according to law and acting as such.

On or about February 19, 2022, within the Eastern District of New York and elsewhere, the defendant WILLIE VITAL, together with others, did knowingly and intentionally obstruct, delay and affect commerce and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of a bodega located at 114-02 Rockaway Boulevard in Queens, New York.

(Title 18, United States Code, Section 1951(a))

1. The ATF and the New York City Police Department (the “NYPD”) are investigating a series of related armed robberies of bodegas located in Brooklyn and Queens, New York in January and February 2022 (collectively, the “Armed Robberies”).

January 23, 2022 Armed Robbery

2. On January 23, 2022, at approximately 10:46 p.m., two robbers entered and robbed a bodega located at 1730 Coney Island Avenue, Brooklyn, New York 11230 (the “January 23 Armed Robbery”). Both robbers displayed firearms. The robbers stole, among other things, approximately \$2,500 in cash.

3. I have reviewed surveillance videos from inside the bodega at the time of the robbery. One of the robbers can be seen wearing a highly distinctive dark-colored, hooded sweatshirt with a particular design on the chest and sleeves, as shown below in a still image taken from surveillance video.



February 12, 2022 Armed Robberies

4. On February 12, 2022, two armed robberies were committed in Brooklyn, New York (the “February 12 Armed Robberies”).

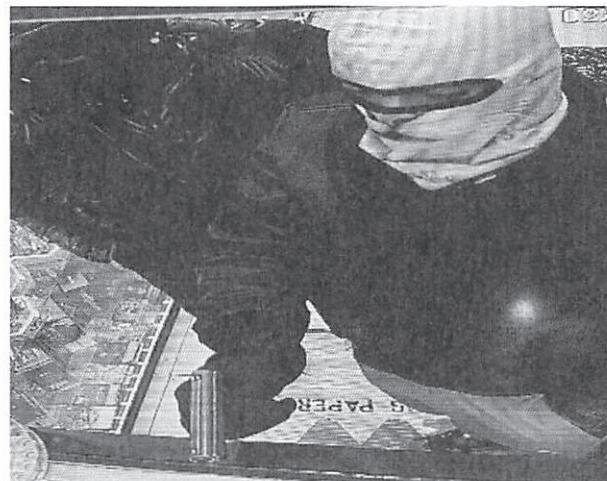
5. At approximately 10:30 p.m., two individuals entered and robbed a bodega located at 216 Driggs Avenue in Brooklyn, New York. One robber brandished a black firearm. The robbers stole approximately \$8,400 in cash, among other things. A victim of the

robbery, whose identity is known to me, noted that one of the robbers was wearing a cat-like face mask.

6. At approximately 10:55 p.m., what appear to be the same two individuals entered and robbed a bodega located at 489 Grand Street in Brooklyn, New York, approximately one mile away from the robbery described in the previous paragraph. As seen in the still image below, taken from surveillance video located inside, one robber wore a distinctive cat-like face mask, consistent with the description reported by the victim at 216 Driggs Avenue, along with red pants.



7. The still image below shows one robber point a gun at a store employee.



8. The robbers stole approximately \$500, two business checks and an Apple iPhone, among other things, before escaping.

February 19, 2022 Armed Robberies

9. On February 19, 2022, two armed robberies were committed in Brooklyn and Queens, New York, as captured by surveillance video (the “February 19 Armed Robberies”).

10. At approximately, 12:20 a.m., two individuals entered and robbed a bodega located at 114-02 Rockaway Boulevard in Queens, New York (the “First February 19 Armed Robbery”). Both robbers brandished firearms. The robbers stole approximately \$1,500 in cash, among other things.

11. I have reviewed surveillance videos from the bodega at the time of the robbery. One robber is captured wearing what appears to be the same distinctive cat-like face mask that one of the robbers wore during the February 12 Armed Robberies, along with green-colored pants and green-colored suede tennis shoes. The second robber can be seen wearing what appears to be the same dark-colored puffer jacket with a hood that the other robber wore during the February 12 Armed Robberies. The two robbers are depicted below in still images taken from video surveillance of the robbery.



12. At approximately 1:43 a.m., what appear to be the same two individuals entered and robbed a bodega located at 565 Lenox Road in Brooklyn, New York, approximately a thirty-minute drive from the robbery described in paragraph 10. Both robbers brandished firearms, and they stole approximately \$2,000.

13. I have reviewed surveillance videos from the bodega at the time of the robbery. One robber is captured wearing what appears to be the same distinctive cat-like face mask that one of the robbers wore during the February 12 Armed Robberies and during the First February 19 Armed Robbery, along with wearing green-colored pants and green-colored suede tennis shoes that robber wore during the First February 19 Robbery. The second robber can be seen wearing what appears to be the same dark-colored puffer jacket with a hood that the other robber wore during the February 12 Armed Robberies and during the First February 19 Armed Robbery.

Information Connecting the Defendant WILLIE VITAL to the Armed Robberies

14. On March 15, 2022, the defendant WILLIE VITAL was arrested by the New York City Police Department on New York State forgery charges. At the time of his arrest, VITAL was wearing what appear to be the same green-colored pants and green-colored suede tennis shoes as the robber who was also wearing the distinctive cat-like face mask during the February 19 Armed Robberies. See ¶ 12, above.

15. Moreover, pursuant to a lawful search of the vehicle the defendant WILLIE VITAL was driving at the time of his arrest, officers recovered additional evidence of the Armed Robberies described above. For example, as shown in the image below, officers recovered what appears to be the same highly distinctive sweatshirt that one of the robbers wore during the January 23 Armed Robbery. See ¶ 3, above.



16. Further, officers recovered from the vehicle WILLIE VITAL was driving what appear to be the same red pants that the robber who was also wearing the distinctive cat-like face mask wore during the February 12 Armed Robberies. See ¶¶ 5, 7, above.

17. Additionally, on or about February 22, 2022, I and other law enforcement observed an individual who appeared to be WILLIE VITAL exiting a single-family residence in

Bronx, New York, and we observed the car WILLIE VITAL was driving when arrested parked outside that residence on or about March 8, 2022. Also parked outside the same residence on or about February 17, 2022 was a Toyota Camry with New York license plate number T654297C (the “Camry”). The Camry was searched on consent following the arrest of another individual on February 23, 2022, and officers recovered evidence of the February 12 and February 19 Armed Robberies, including stolen checks bearing the names of targeted bodegas the distinctive cat-like face mask shown below, as well as a gun. License plate readers reveal that the Camry drove into Queens over the Queensboro Bridge approximately two hours before the first February 19 Armed Robbery, which took place in Queens, and drove out of Brooklyn across the Manhattan Bridge approximately one hour after the second February 19 Armed Robbery, which took place in Brooklyn.



18. Based on the foregoing facts, I submit that there is probable cause to believe that WILLIE VITAL committed the robbery of the bodega located at 114-02 Rockaway Boulevard in Queens, New York on February 19, 2022.

WHEREFORE, I respectfully request that the defendant WILLIE VITAL be dealt with according to law.



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THOMAS NUZIO

Task Force Officer  
Bureau of Alcohol, Tobacco, Firearms and  
Explosives

Sworn to before me by telephone this  
16<sup>th</sup> day of March, 2022



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THE HONORABLE JAMES R. CHO  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK